



RECORDED
11.9
UNION CAMP CORPORATION
HARLEY BAG DIVISION

P.O. Box 5497 • Spartanburg, S.C. 29304 • Tel. 803/585-3431

January 14, 1983

Mr. E. M. Horton, Sr.
241 Dunbarton Drive
Spartanburg, South Carolina 29302

RE: Leonard Chemicals

Dear Mr. Horton:

It appears Harley Corporation is involved in another hazardous waste site clean up similar to the Carolawn situation.

In May and July 1981, Harley Corporation utilized the services of Leonard Chemical Company, Inc., Rock Hill, South Carolina, to dispose of waste ink by solvent reclamation. The reclaimed solvents were to be purchased back by Harley Corporation and the still bottoms to be disposed of by Leonard Chemical.

The following sequence of events pertains to this situation.

A. May 21, 1981

1. Harley PO #19105, 30 drums of waste ink sent to Leonard Chemical Company, Inc., Rock Hill, South Carolina for trial solvent reclamation via Leonard Chemical truck. The reclaim solvent was to be purchased back by Harley Corporation @ \$1.00/gallon, and all solids to be returned this order only.
2. Harley receiving record, No. 901 - June 10, 1981, shows receipt of 9 drums of reclaim solvent and 10 drums of sludge via Leonard Chemical truck.
3. One drum of the reclaim solvent was tested by Harley, but found not to be satisfactory.
4. The remaining 8 drums of reclaim solvent was shipped to Mitchell Systems, Inc., Spruce Pine, North Carolina on North Carolina-manifest No. 1, September 14, 1981, for disposal by incineration.
5. The 10 drums of sludge was inadvertently shipped to SCA Chemical Services, Pinewood, South Carolina on South Carolina manifest No. 4761, September 2, 1981, where it was REJECTED. The entire load was then

shipped to Caldwell Systems, Inc., Lenoir, North Carolina on South Carolina manifest No. 29503, for disposal by incineration.

B. July 28, 1981

1. Harley PO #19461, 30 drums of waste ink sent to Leonard Chemical Company, Inc., Rock Hill, South Carolina for trial solvent reclamation via Leonard Chemical truck. Lawrence Leonard of Leonard Chemical had expressed interest that he could sell the reclaimed solvent.
2. In January 1982, it was learned that Leonard Chemical was under investigation by DHEC.
3. Leonard Chemical was notified to return all materials that had been shipped to them for solvent reclamation.
4. Harley receiving record No. 905, March 3, 1982, shows receipt of 5 drums of reclaim solvent and 9 drums of sludge via Leonard Chemical truck.
5. Some of the reclaimed solvent had been retained by Leonard Chemical to be used as samples to his customers.
6. The 5 drums of reclaim solvent and 9 drums of sludge was shipped to Caldwell Systems, Inc., Lenoir, North Carolina on North Carolina manifest No. 12, March 30, 1982 for disposal by incineration.
7. When the above mention drums were returned by Leonard Chemical, a letter was signed by Lawrence K. Leonard, Leonard Chemical and E. H. Mason and C. T. Johnson of Harley Corporation, date February 19, 1982, that all materials originally sent to Leonard by Harley had been received from Leonard Chemical and all drums emptied for possible reuse by Leonard.

Letter of May 3, 1982, from DHEC showed that authorization to ship to Leonard Chemical had been voided as Leonard Chemical Company's permit to operate had been suspended.

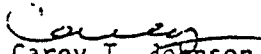
January 14, 1983, received letter from Leonard Chemical Generator's Committee requesting records of transactions between Harley Corporation and Leonard Chemical.

Enclosed are copies of all documents pertaining to above matters. This project is being transferred to you.

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January 14, 1983
Mr. E. M. Horton, Sr.

If I can be of further assistance, please advise.

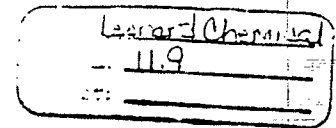
Sincerely,


Carey T. Johnson
Environmental Engineer

CTJ/bip

cc: R. E. Dillon/Savannah
W. W. Furrer/Wayne
R. A. Harley/Spartanburg
D. M. Meany/Wayne
E. H. Mason/Spartanburg

enclosures



Alexa D. Perry
Associate Counsel

1600 VALLEY ROAD, WAYNE, NJ 07470 TELEPHONE (201) 628-2488

April 20, 1990

Strick M. Tobin
Director
Waste Management Division
U.S. Environmental Protection Agency
Region IV
15 Courtland Street, N.E.
Atlanta, GA 30365

Re: General and Special Notice Letter
Leonard Chemical Company
York County, South Carolina

Dear Mr. Tobin:

I am writing on behalf of Union Camp Corporation in response to the General and Special Notice Letter, of unspecified date, which you sent to Mr. Dennis Meany of Union Camp Corporation. The letter alleges that Union Camp Corporation is either a transporter or generator of hazardous substances at the Leonard Chemical Company Site.

Attached are three letters written by Mr. Meany dated August 25, 1988; September 19, 1988; and August 25, 1989, in connection with this Site. The first of the three letters was written to Ms. Lynn Martin of DE, while the second and third were written to Mr. Thomas Griswold of Textron, Inc. As is evident from these letters, Union Camp is not a PRP at the Leonard Chemical Site. In April, 1982, Union Camp purchased some of the assets of Harley Corporation. Union Camp purchased neither all of Harley's assets nor any of its stock. Union Camp did not assume any liability regarding Harley's prior off-site

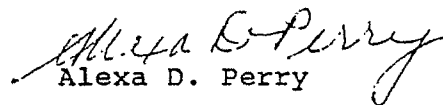
Mr. Tobin
April 20, 1990
Page 2

waste disposal activities. Harley continued as a viable corporation for at least 1 1/2 years after Union Camp's purchase. We believe that Harley participated as a PRP at this Site and may have even contributed monies to the PRP Group.

Union Camp has no liability concerning the Leonard Site. We suspect that Mr. Meany's name appears on your PRP list solely because he responded to an August, 1988 DHEC letter concerning the Site, which was sent to our Union Camp facility, but obviously intended for Harley.

Therefore, kindly remove us from your mailing list.

Very truly yours,


Alexa D. Perry

ADP/jas
Attachments
J0183

cc: Wayne Lee (w/ attachments)
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365

Dennis M. Meany
Associate General Counsel
& Assistant Secretary

UNION CAMP CORPORATION 1600 VALLEY ROAD, WAYNE, NJ 07470 TELEPHONE (201) 628-2495

August 25, 1989

Thomas H. Griswold, Esq.
Division Counsel
Homelite Division of Textron, Inc.
P. O. Box 7047
Charlotte, North Carolina 28241

Re: Leonard Chemical Company Site

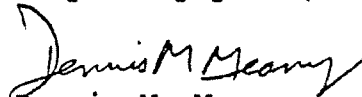
Dear Mr. Griswold:

Attached please find a copy of a letter written to you approximately one year ago on the above-referenced matter. You either chose to ignore it or misplaced it. Assuming the latter, I will reiterate the basic facts.

In April of 1982, Union Camp purchased some of the assets of Harley Corporation. However, it purchased neither all of Harley's assets nor any of its stock. The purchase was limited to certain assets, rights and liabilities and no liabilities were assumed regarding Harley's prior, off-site waste disposal activities. Harley Corporation continued as a viable corporate entity for at least one and a half years after our purchase and I believe participated as a PRP at the Leonard Site including the contribution of monies to the PRP Group. I can only presume from your letter that it is no longer participating. It is my understanding that Harley is now liquidated and dissolved.

Union Camp has no liability concerning the Leonard Site and will assume no responsibility therefor. It is therefore requested that you remove us from your mailing list.

Very truly yours,


Dennis M. Meany

DMM/jes
Attachment

bcc: A. M. Deones
F. R. Espy
R. A. Thorne
W. A. Williams

bcc: D. P. Crenshaw
F. R. Espy
R. A. Thorne
W. A. Williams

Dennis M. Meany
Associate General Counsel
& Assistant Secretary

UNION CAMP CORPORATION 1600 VALLEY ROAD, WAYNE, NJ 07470 TELEPHONE (201) 628-2495

August 25, 1988

Ms. Lynn C. Martin, Director
Division of Site Engineering and Screening
Bureau of Solid and Hazardous Waste Management
S.C. Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Re: Leonard Chemical NPL Site
York County

Dear Ms. Martin:

In response to your letter of August 16, 1988 to Mr. David P. Crenshaw on the above-referenced matter, please be advised that Mr. Crenshaw is employed by Union Camp Corporation and not Harley Corporation. Further, please be advised that there is no Harley Division of Union Camp Corporation.

Your confusion is likely due to the fact that Union Camp purchased some of the assets of Harley Corporation on April 6, 1982. However, it purchased neither all of Harley's assets nor any of its stock. The purchase was limited to certain assets, rights and liabilities and no liabilities were assumed regarding Harley's prior, off-site waste disposal activities. Harley Corporation continued as a viable corporate entity for at least a year and a half after our purchase. At some point since then, I believe, it was liquidated and dissolved.

Union Camp, to the best of our knowledge, never generated, transported, or had transported for it any waste which went to the Leonard Site and it is therefore not a potentially responsible party at that Site. As such we have no intention of attending the September 7th meeting announced in your August 16th letter.

Very truly yours,

158 52 15 02
Dennis M. Meany
Dennis M. Meany

DMM/jes

file

bcc: D. P. Crenshaw
F. R. Espy
R. A. Thorne
W. A. Williams

Dennis M. Meany
Associate General Counsel
& Assistant Secretary

UNION CAMP CORPORATION 1600 VALLEY ROAD, WAYNE, NJ 07470 TELEPHONE (201) 628-2495

September 19, 1988

Thomas H. Griswold, Esq.
Division Counsel
Homelite Division of Textron, Inc.
P.O. Box 7047
Charlotte, NC 28217

RE: Leonard Chemical Company Superfund Site

Dear Mr. Griswold:

Attached please find our August 25, 1988 response to DHEC concerning the above-referenced Site. As you will note, Union Camp is not a PRP at this Site and that is the reason it did not attend your September 7 meeting.

We can only speculate as to whether or not Harley is a PRP at this Site. Obviously, the fact that it contributed money (more than a year after its sale of some assets to Union Camp) and otherwise participated in your Committee meetings indicates that this may be the case. However, this liability in no way was assumed by Union Camp, and I suggest your effort to determine how to spend this money is better served by attempting to contact Harley and/or its shareholders.

Very truly yours,

Dennis M. Meany
Dennis M. Meany

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Enclosure